

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DR. KEENAN COFIELD, JD/Ph.D/Psy.D/DD
and The Supreme **GRAND** Bishop-Cofield
et. al.

PLAINTIFF(S)/CLAIMANTS

Vs

CASE NUMBER: **1:22-cv-00727-(ELH)**

WORKTIME, INC.
PROGRESSIVE CLAIMS
THE PROGRESSIVE CORPORATION, et. al.

DEFENDANTS

**PLAINTIFFS –MOTION FOR AN ORDER COMPELLING DISCOVERY
OR IN THE ALTERNATIVE TO REQUEST JUDICIAL NOTICE OF
STATE COURT FILING MOTION UPON REMOVAL
NO HEARING IS REQUESTED OR NEEDED**

Comes now the Plaintiffs, Dr. Keenan Cofield, before this Honorable Court and file the
above styled MOTION also seeking Judicial Notice of a State Court Motion attached that was
filed with the State Court **BEFORE**, REMOVAL that was subject to REMOVAL from the Circuit
Court for Baltimore CITY, MD, and also pursuant to **MD Rule 2-432(a),(b),(A),(B),(D),(E)** do
hereby file Plaintiffs **[MOTION TO COMPEL DISCOVERY]**, based upon the following reasons:

- a). The instant case was REMOVED from the State Courts on March 29, 2022.
- b). A stamp filed copy is attached for the record and in further support of this Motion.
- 1). The Defendants have each even with counsel for several weeks have failed and refuse to
comply with the Plaintiff(s) Discovery requests filed over (30) days ago, in violation of **MD Rule
2-432(a),(b),(A),(B),(D),(E), (d), and (e).**

- 2). The Defendants have not contacted the Plaintiff(s) for any EXTENSION of other response.
- 3). The Plaintiffs shall be prejudice by any Order not to Compel the Defendants to answer and fully respond to the DISCOVERY Requests.
- 4). The Defendants have WAIVED any rights to make any objections to the Discovery requests.
- 5). The Plaintiff(s) Motion warrants immediate action by this Honorable Court.
- 6). No Sanctions are necessary at this time against the Defendants.

WHEREFORE, GOOD CAUSE SHOWN, the Plaintiff(s) pray that this Honorable Court **GRANT** said **MOTION COMPELLING ALL DEFENDANTS** TO fully response to the Discovery requests, and Deposition for Written Questions. FURTHERMORE, the Plaintiff request that this Honorable Court take Judicial Notice of the State Court filings, and the rules of that Court at that time of submission of the motion with that Court for the extended purpose of this pending motion and consideration thereof. The Plaintiff(s) seek any and all other relief this Court deem to award and/or grant on this matter, and NO further delays can be given, needed nor necessary.

NO HEARING IS REQUESTED OR NEEDED



Dr. Keenan Cofield
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Dated this the 29th day of March, 2022


Dr. Keenan Cofield

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the above and foregoing has been filed, HAND-DELIVERED and served upon the US District Court in Baltimore, MD, and any and ALL other Defendants or Defendants Counsel on this the 29th day of March, 2022, and/or placed in the United States mail postage prepaid, to all Defendants so served, and served by this Court via the CM/ECF electronic service system of this Court.


Dr. Keenan Cofield